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8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 PATRICIA MCTERNAN,
12
13 Plaintiff,
14 vs.
15 ANDREW SAUL,
Commissioner of Social Security
16 Defendant.
17

Case No.: 3:18-cv-07036-WHO

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR EXTENSION
OF TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT**

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19 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record
20 that the time for responding to Plaintiff's Motion Summary Judgment be extended from August
21 14, 2019 to **August 23, 2019**. This is Defendant's third request for extension. Good cause exists
22 to grant Defendant's request for extension. Counsel has been out of the office on intermittent
23 leave following chronic migraines, which impair her vision, including the last two weeks. In
24 addition, Counsel also has over 100+ active social security matters, which require two or more
25 dispositive motions per week until the mid-September, as well as three pending Ninth Circuit
26 matters, which require several levels of review. Due to heavy caseload and unexpected leave,
27 Counsel fell behind on her work and needs additional time to adequately review the transcript
28 and properly respond to Plaintiff's Motion for Summary Judgment. The parties further stipulate

1 that the Court's Scheduling Order shall be modified accordingly. Defendant makes this request
2 in good faith with no intention to unduly delay the proceedings. Counsel apologizes for the
3 belated request, but made her request as soon as reasonably practicable, as she also has been out
4 of the office.

5 Respectfully submitted,

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7 Respectfully submitted,

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9 Dated: August 14, 2019

/s/ Terry LaPorte
(*as authorized by email on August 14, 2019)
TERRY LaPORTE
Attorney for Plaintiff

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12 Dated: August 1, 2019

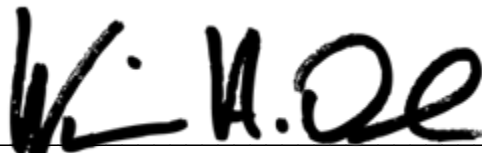
DAVID L. ANDERSON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
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17 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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20 **ORDER**

21 APPROVED AND SO ORDERED:

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23
24 DATED: August 20, 2019



THE HONORABLE WILLIAM H. ORRICK
UNITED STATES DISTRICT COURT JUDGE